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Attorneys for Plaintiff, Chapter 7 Trustee Sarah L. Little

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

In re

Nariman Seyed Teymourian,

Debtor.

Sarah L. Little, Chapter 7 Trustee,

Plaintiff,

vs.

Nariman Seyed Teymourian,

Defendant.

Case No. 23-30668 DM

Chapter 7

Adv. Proc. No. 24-03027

**PLAINTIFF'S STATUS
CONFERENCE STATEMENT**

Date: January 31, 2025

Time: 1:30 p.m.

To be held Via-Tele/Videoconference

Plaintiff, Sarah L. Little, Chapter 7 Trustee of the bankruptcy estate of Nariman Seyed Teymourian ("Plaintiff") submits the following status conference statement.

I. Nature of Case.

The Complaint in this matter was filed on July 16, 2024. The Complaint asserts three (3) claims for denial of the debtor's discharge pursuant to 11 U.S.C. Sections 727(a)(2)(A), (a)(3), and (a)(4)(A) and (D).

II. Status of Pleadings.

The Complaint, Summons and Order Re Initial Disclosures and Discovery Conference was served on the Defendant on July 19, 2024. The Defendant filed his answer pro per, on August 15, 2024.

III. Status of Initial Disclosures and Discovery.

Plaintiff served her Initial Disclosures on Defendant on September 3, 2024. The Debtor has not served his Initial Disclosures. The Court had previously set discovery deadlines which were later vacated pursuant to a stipulation of the parties and an order of the court approving the stipulation. The genesis of the stipulation was the fact that Brette Evans substituted into the main case for Debtor and worked with the Debtor to provide documents to the Trustee by the end of December 2024. The Debtor, through Ms. Evans' office, did provide documents to the Trustee. The documents are currently being reviewed by the Trustee and her accountants to determine if additional formal discovery from the Debtor will be needed.

IV. Settlement/ADR

Plaintiff has no objection to participating in the Bankruptcy Court's BDRP Program, however, as the court is aware any settlement of the Complaint Objecting to the Debtor's Discharge would need to be approved by the court after notice to creditors. Given the activity level of the creditors in this case, Plaintiff believes that any settlement of the 727 claims against the Debtor may prove difficult. The idea of the Debtor stipulating to denial of his discharge without prejudice has been floated out by Ms. Evans.

V. Continued Status Conference

Plaintiff suggests that it would be appropriate to set a continued status conference out approximately 60 days to allow the Trustee to finish her analysis of the documents provided by the Debtor and determine their effect on the claims set forth in her complaint and what additional

discovery may be needed.

Dated: January 21, 2025

Kornfield, Nyberg, Bendes, Kuhner & Little, P.C.

By: /s/ Eric A. Nyberg

Eric A. Nyberg (Bar No. 131105)
Attorneys for Plaintiff Sarah L. Little, Chapter 7
Trustee

DECLARATION OF SERVICE

I, the undersigned, declare:

I am employed in the City of Oakland, County of Alameda, California. I am over the age of 18 years and not a party to this action. My business address is 1970 Broadway, Suite 600, Oakland, California 94612.

I am readily familiar with the business practices of my employer, Kornfield, Nyberg, Bendes, Kuhner & Little, P.C., for the collection and processing of correspondence for mailing with the United States Postal Service and that correspondence is deposited with the United States Postal Service that same day in the ordinary course of business unless indicated below by electronic service.

On January 21, 2025, I served the following documents:

PLAINTIFF'S STATUS CONFERENCE STATEMENT

by placing copies of said documents in a sealed envelope by first class mail and served in the manner described below addressed as follows:

First Class Mail and Via-Email
narimantey@gmail.com
Nariman Seyed Teymourian
125 Greenley Road
New Canaan, CT 06840

Via-ECF
Brette L. Evans
Kelly Klokow
Evans Law Offices
255 N. Market Street, Suite 110
San Jose, CA 95110

I placed such envelopes for collection and mailing at my employer's office following ordinary business practices, addressed to the addressee designated.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 21st day January , 2025 at Danville, California.

/s/ Gail A. Michael